

Before The  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of

The North American Numbering Council Report And  
Recommendation Concerning Abbreviated Dialing  
Arrangements

NSD File No. 98-139

92-105

**COMMENTS OF THE SBC COMMUNICATIONS, INC.**

SBC Communications, Inc. ("SBC"), on behalf of its wireline and wireless affiliates,<sup>1</sup> supports the recommendations in the September 23, 1999 report of the North American Numbering Council ("NANC") concerning abbreviated dialing arrangements.<sup>2</sup> That report, which builds on two prior industry investigations of abbreviated dialing and industry consensus on these issues,<sup>3</sup> correctly concludes that abbreviated dialing should not be used as a means of providing internetwork "speed-dial" type options, but should, instead, be used for information-type services. As the report recognizes, if abbreviated dialing were used simply to provide shorter dialing for existing Plain Old Telephone ("POTS") numbers, the demand would quickly overwhelm the available resource (for any sequence of fewer than seven digits).

<sup>1</sup> SBC submits these comments on behalf of Southwestern Bell Telephone Company, Pacific Bell, Nevada Bell, Southern New England Telephone Company, Southwestern Bell Mobile Systems, Southwestern Bell Wireless, Inc., and Pacific Bell Mobile Systems.

<sup>2</sup> See "Report and Recommendations of the Abbreviated Dialing Ad Hoc Working Group to the North American Numbering Council (NANC) Regarding Abbreviated Dialing Arrangements" (dated Sept. 23, 1998) [available at <http://www.fcc.gov/ccb/Nanc/nanccorr.html>] ("Report").

<sup>3</sup> See "Local Calling Area Abbreviated Dialing Access to Information and Enhanced Services: A Report of the Information Industry Liaison Committee" (IILC Issue #036) (dated Sept. 14, 1994); Industry Numbering Committee Issue #021 ("Abbreviated Dialing"), (submitted Dec. 10, 1993, resolved March 8, 1996). See also Report, at 5-6 (summarizing prior industry standards work on abbreviated dialing issues).

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When abbreviated dialing is properly limited in this fashion, as it must be, it does not appear that there is sufficient demand nor is there a sufficient public interest to justify the cost associated with implementing internetwork abbreviated dialing arrangements. Today, information service providers have more than sufficient resources available, many of which can be used to implement similar dialing patterns region- or nation-wide. The report thus properly recognizes that "there appears to be little, if any, demonstrated need for additional nationally administered abbreviated dialing arrangements...."<sup>4</sup> Assigning new resources to abbreviated dialing in these circumstances would appear only to enhance the supply of an already underutilized resource, and at a significant cost (with little apparent added value).

The minority reports should not distract the Commission from the clear and unambiguous consensus of the industry. The fact that the industry was able to reach consensus show that these opinions are on the fringes, and are not part of the mainstream debate between industry participants. For example, Low Tech Designs, in a minority report, urges use of abbreviated dialing for "speed dial" type applications, recommending use of a leading "\*" as the demarc for the abbreviated dialing pattern. However, using the leading "\*" for abbreviated dialing would cause substantial customer confusion, because that demarc is already used for vertical service codes. Customers would clearly be confused if a leading "\*" indicator was used for both abbreviated dialing and vertical services.<sup>5</sup> Moreover, if abbreviated dialing served the function of speed dial, as Low Tech urges, the resource would be consumed almost overnight.

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<sup>4</sup> *Report*, at 3.

<sup>5</sup> There are numerous examples of such customer confusion. A customer might find that it is connected to a 10-digit POTS location, over toll or even LATA boundaries, and has incurred the expense for such a call. Or the customer might find that it has reached an unexpected information service provider, with additional and unanticipated ISP charges. This type of confusion would only decrease use of leading "\*" dialing for all purposes, as callers would not know what to expect when they placed such calls.

While the leading "\*" might benefit Low Tech, it would clearly disserve the industry and customers.

The other minority report fails to provide any specific proposal, because it has none. MCI offers nothing other than complaints about the process – a process that MCI itself, as co-chair of the working group, led.<sup>6</sup> MCI wrongly complains that the representation on the working group was unbalanced, but fails to note that any industry member could have requested membership on the working group, or could have participated in the working group meetings. MCI baldly alleges that incumbent LECs have the incentive to discourage abbreviated dialing because they can promote their own abbreviated dialing, but fails to acknowledge that the Commission already has held that LECs must provide nondiscriminatory access to N11 codes.<sup>7</sup> MCI complains about 555-XXXX access, but fails to recognize that many carriers provide 555 access today, and there is little demand for that service. MCI also misleadingly cites an example where wireless carriers in Colorado cooperated to perform intranetwork abbreviated dialing arrangements (\*CSP for "road rage" complaints), but fails to note that all carriers, including wireline carriers, could do the same thing – in fact, the NANC report properly did not even address the issue of intranetwork abbreviated dialing.

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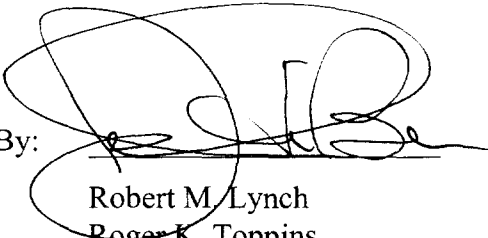
<sup>6</sup> MCI co-chaired the Ad Hoc Working Group. *See Report*, Appendix C (listing co-chairs and representatives).

<sup>7</sup> *See In re: The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, First Report And Order and Further Notice of Proposed Rulemaking, 12 FCC Rcd. 5572, 5601 (¶ 48), 5616 (¶ 86) (FCC Feb. 19, 1997).

In short, the minority opinions should raise no concern for the Commission. SBC thus urges the Commission to accept and adopt the industry consensus opinions in the Report, and reject the minority reports.

Respectfully submitted,

SBC COMMUNICATIONS, INC.

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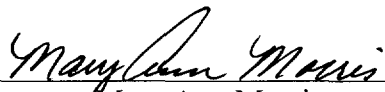
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January 13, 1999.

**Certificate of Service**

I, Mary Ann Morris, hereby certify that the foregoing "Comments of Southwestern Bell Telephone Company," in NSD File No. L-98-139 (CC Docket 92-105) has been served on January 13, 1999 to the Parties of Record.

  
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Mary Ann Morris

January 13, 1999

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